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Before The
Federal Communications Commission
Washington, D.C. 20554

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MAY 26 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Advanced Television Systems) MM Docket No. 87-268
and Their Impact Upon the)
Existing Television Broadcast)
Service)

To: The Commission

OPPOSITION TO PAPPAS PETITION FOR RECONSIDERATION

Kentucky Authority for Educational Television ("KET"), by its counsel, opposes the "Petition for Reconsideration" filed April 20, 1998 in this proceeding by Pappas Telecasting of America (the "Pappas Petition").

Pappas takes issue with the FCC's failure in the *Memorandum Opinion and Order on Reconsideration of the Sixth Report and Order*, FCC 98-24 (released February 23, 1998), to arrange or rearrange DTV allotments so as to permit Pappas to prosecute its pending NTSC application on Channel 48 at Owensboro, Kentucky. In particular, Pappas states that the allotment of Channel 48 as the DTV paired channel for KET's noncommercial educational station WKGB-TV, Bowling Green, Kentucky, would preclude the use of Channel 48 on an NTSC basis by Pappas at Owensboro. Pappas therefore urges that the Commission either substitute Channel 47 for Channel 48 as the DTV channel for Station WKGB-TV, or permit Pappas to prosecute its pending NTSC application at Owensboro on Channel 47 instead of Channel 48.

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KET is not un-sympathetic to the concerns underlying the Pappas Petition and understands why Pappas believes that some consideration should be given to its investment in its application at Owensboro. However, KET, as an instrumentality of the Commonwealth of Kentucky and a public broadcaster, cannot afford to commission complete engineering evaluations of proposals that third parties make for their benefit. KET thus does not know whether the channel substitution proposed by Pappas would in fact cause any present or future negative impact on KET's operation of digital facilities for Station WKGB-TV, and KET is unable to understand, much less rely on, the cryptic engineering statement contained in the Pappas Petition. In the absence of complete confidence that the suggested change would not result in any harm with respect to interference-free replication of WKGB-TV's coverage and all other pertinent engineering factors, KET feels compelled to oppose the Pappas proposal.

Moreover, KET strongly believes that the continuing risk of potential involuntary changes to stations' DTV allotments generated by reconsideration petitions such as Pappas' creates uncertainty, inhibits planning and unnecessarily complicates and slows the transition to digital. KET needs to know with certainty and finality which channel it

may use at Bowling Green (and elsewhere)^{1/} so that it can engage in appropriate planning, order equipment and undertake the myriad other tasks necessary to enable it to go digital.

Therefore, KET objects to changing the DTV allotment for WKGB-TV to Channel 47 instead of Channel 48. KET also urges the Commission to resolve all uncertainties with respect to DTV channel allotments quickly and finally.

Respectfully submitted,

KENTUCKY AUTHORITY FOR
EDUCATIONAL TELEVISION

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^{1/} KET is the operator of the Kentucky Public Television Network and is licensee of 16 noncommercial educational television stations which it feeds programming by satellite. Clearly, KET faces an enormous task to convert the network programming center, its satellite distribution system and the sixteen transmitters (and a number of associated TV translator stations).

CERTIFICATE OF SERVICE

I certify that I have this 26th day of May, 1998, served copies of the foregoing "Opposition to Pappas Petition for Reconsideration" by First Class U.S. Mail or by hand delivery upon the following:

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